

February 21, 2007

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Fresh Products Branch
Fruit & Vegetable Programs
Agricultural Marketing Service
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Room 1661 South Building, Stop 0240
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Dear Ms. Emery:

Re: United States Standards for Grades of **Parsley**Docket # AMS-FV-2006-0201; FV-06-314
Federal Register Vol. 71, No. 247, 12/26/06, page 77366

The North American Perishable Agricultural Receivers (NAPAR) is a national trade association located in Washington, DC, representing independent produce wholesale receivers. NAPAR members are predominantly small businesses with combined annual sales in excess of \$4 billion. NAPAR formed an operating alliance with the Food Marketing Institute in 1999, enabling it to function independently while expanding the services to its members.

NAPAR surveyed its members, soliciting their input on the probable impact these changes would have on their business operations. Respondents were very much in favor of the proposal to allow the percentages for tolerances, defects and the like to be determined by count and not weight.

I hope these insights are helpful and please feel free to contact me directly if NAPAR can provide further assistance during this process.

Sincerely,

Patrick A. Davis

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President